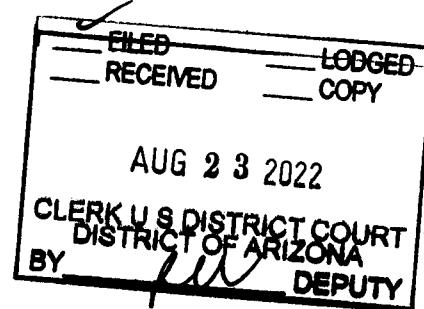


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10 IN THE UNITED STATES DISTRICT COURT
11
12 FOR THE DISTRICT OF ARIZONA

13 United States of America,
14 Plaintiff,
15 vs.
16 Ali Joseph,
17 aka Abu Rahaf,
18 aka Ali Kazem Youssef,
19 Defendant.

12 No. CR-22-01070-PHX-DJH (DMF)
13
14 **INDICTMENT**
15 VIO: 18 U.S.C. § 1958(a)
16 (Use of Interstate Commerce
17 Facilities in the Commission of
18 Murder-For-Hire)
19 Count 1
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18 U.S.C. §§ 981 and 982,
21 U.S.C. §§ 853 and 881, and
28 U.S.C. § 2461(c)
(Forfeiture Allegation)

23 **THE GRAND JURY CHARGES:**

24 **COUNT 1**

25 Between on or about May 9, 2022, and on or about August 23, 2022, in the District
26 of Arizona and elsewhere, the defendant, ALI JOSEPH, aka Abu Rahaf, aka Ali Kazem
27 Youssef, did use a facility of interstate commerce, and did cause another to use a facility
28 of interstate commerce, including a telephone and an internet-based encrypted messaging

1 application, with the intent that the murder of victim A. A. be committed in violation of
2 the laws of the United States and the State of Arizona, as consideration for the receipt of,
3 and as consideration for a promise and agreement to pay anything of pecuniary value, to
4 wit: approximately \$3,000.00.

5 In violation of Title 18, United States Code, Section 1958(a).

6 **FORFEITURE ALLEGATION**

7 The Grand Jury realleges and incorporates the allegations of Count 1 of this
8 Indictment, which are incorporated by reference as though fully set forth herein.

9 Pursuant to Title 18, United States Code, Sections 981 and 982, Title 21, United
10 States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), and
11 upon conviction of the offense alleged in Count 1 of this Indictment, the defendant shall
12 forfeit to the United States of America all right, title, and interest in (a) any property
13 constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as
14 the result of the offense, and (b) any of the defendant's property used, or intended to be
15 used, in any manner or part, to commit, or to facilitate the commission of such offense.

16 If any of the forfeitable property, as a result of any act or omission of the
17 defendant(s):

18 (1) cannot be located upon the exercise of due diligence,
19 (2) has been transferred or sold to, or deposited with, a third party,
20 (3) has been placed beyond the jurisdiction of the court,
21 (4) has been substantially diminished in value, or
22 (5) has been commingled with other property which cannot be divided without
23 difficulty,
24 it is the intent of the United States to seek forfeiture of any other property of said
25 defendant(s) up to the value of the above-described forfeitable property, pursuant to Title
26 21, United States Code, Section 853(p).

27

28

1 All in accordance with Title 18, United States Code, Sections 981 and 982, Title 21,
2 United States Code, Sections 853 and 881, Title 28, United States Code Section 2461(c),
3 and Rule 32.2, Federal Rules of Criminal Procedure.

4 A TRUE BILL
5
6 /s/
7

8 FOREPERSON OF THE GRAND JURY
9 Date: August 23, 2022
10

11 GARY M. RESTAINO
12 United States Attorney
13 District of Arizona
14
15

16 /s/
17 DAVID A. PIMSNER
18 KEVIN C. HAKALA
19 Assistant U.S. Attorneys
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